

REMARKS/ARGUMENTS

Claims 1-4 and 6-16 are pending.

Claims 1-4 and 6-16 stand rejected.

Claim 5 has been previously canceled, without prejudice.

Claim 1 has been amended. Support for this amendment can be found throughout the specification and drawings, as originally filed.

This response is submitted in response to an Advisory Action and is deemed to place the application in a condition for allowance, or alternatively, in better condition for appeal.

35 USC §103(a) REJECTION

Claims 1-14 stand rejected under 35 USC §103(a) as being unpatentable over Thomson (USPN 5,634,051) in view of Noyes (USPN 5,379,366).

The Applicants respectfully traverse the 35 USC §103(a) rejection of claims 1-14. Claim 5 has been previously canceled, without prejudice, and the subject matter thereof substantially incorporated into independent claim 1.

The standard for obviousness is that there must be some suggestion, either in the reference or in the relevant art, of how to modify what is disclosed to arrive at the claimed invention. In addition, "[s]omething in the prior art as a whole must suggest the desirability and, thus, the obviousness, of making" the modification to the art suggested by the Examiner. *Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 1051, 5 U.S.P.Q.2d (BNA) 1434, 1438 (Fed. Cir.), cert. denied, 488 U.S. 825 (1988). Although the Examiner may suggest the teachings of a primary reference could be modified

to arrive at the claimed subject matter, the modification is not obvious unless the prior art also suggests the desirability of such modification. *In re Laskowski*, 871 F.2d 115, 117, 10 U.S.P.Q.2d (BNA) 1397, 1398 (Fed. Cir.1989). There must be a teaching in the prior art for the proposed combination or modification to be proper. *In re Newell*, 891 F.2d 899, 13 U.S.P.Q.2d (BNA) 1248 (Fed. Cir. 1989). If the prior art fails to provide this necessary teaching, suggestion, or incentive supporting the Examiner's suggested modification, the rejection based upon this suggested modification is error and must be reversed. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d (BNA) 1566 (Fed. Cir. 1990).

The law is also clear that a claim in dependent form shall be construed to incorporate all the limitations of the claim to which it refers. 35 U.S.C. 112, fourth paragraph.

In the interests of expediting prosecution of the instant application, and without admission that any amendment is required, the Applicants have amended claim 1 to positively recite, among other things, a method for utilizing a help software program having a plurality of user databases and a knowledge database, said method comprising the steps of: (1) identifying the user, (2) obtaining an identification code of the identified user, (3) searching the user databases to link the identification code with one of the user databases, (4) accessing specific user data from the linked user database that has been generated as a result of at least one previous interaction between the identified user and the help software program and that is specifically related to the identified user, (5) receiving a user's natural language input, (6) interpreting the natural language input, (7) formulating a response by integrating the natural language input from the user with specific user data from the linked user database and data from the knowledge database, (8) submitting the response to the user, (9) updating

the linked user database with the natural language input and response thereto, whereby future responses to the identified user may refer to the updated linked user database for the identified user, (10) the help program working in conjunction with a computer related application for interacting with a user in a natural language format when the user requires assistance in relation to the computer related application, and (11) formatting the response being further defined as uniquely molding the response to the identified user based upon the specific user data from the linked user database.

Neither Thomson nor Noyes, either alone or in combination therewith, suggests such methodology as recited in independent claim 1, as amended. The Applicants wish to point out that claim 1 has been amended to positively recite that the help program works in conjunction with a computer related application for interacting with a user in a natural language format when the user requires assistance in relation to the computer related application, and that formatting the response is further defined as uniquely molding the response to the identified user based upon the specific user data from the linked user database.

Specifically, Thomson fails to suggest accessing specific user data from a linked user database that has been generated as a result of at least one previous interaction between the identified user and a help software program and that is specifically related to the identified user. Contrary to the Examiner's assertion, Thomson does not address the issue of accession of any specific user information, other than ensuring that the identification code that has been entered by the user is valid. However, this information is independent of, and is not based on, any previous interaction between the identified user and the help software program.

Additionally, Thomson fails to suggest formulating a response by integrating a natural language input from the user with specific user data from the linked user database and data from the knowledge database. As previously noted, Thomson does not access specific user data regarding past interactions with the help software program from a user database. Thus, as the Examiner has acknowledged, it would be impossible to integrate this information with other sources of information to formulate a response, if it is not being collected, accessed and processed in the first place.

Furthermore, Thompson fails to suggest updating the linked user database with a natural language input and response thereto, whereby future responses to the identified user may refer to the updated linked user database for the identified user. Contrary to the Examiner's assertion, Thomson merely updates the index file, as opposed to any linked user database file. There is no discussion of using any of the data generated during the encounter between a user and the help software program for future operational purposes.

Also, Thompson does not disclose a help program that is used in conjunction with a computer software program, but rather is directed solely towards "an information storage, searching and retrieval system." More specifically, the user merely enters his or her Boolean search terms and a list of supposedly relevant references is returned to him or her. There is no provision in Thompson of interacting with the user to solve a problem, especially based on the user's previous interaction with the computer program.

The recitation of Noyes does not cure the deficiencies in the teachings of Thomson. Specifically, Noyes, like Thompson, also fails to suggest, among other things, the combination of accessing specific user data from a linked user database that has been generated as a result of at least

one previous interaction between the identified user and a help software program and that is specifically related to the identified user, formulating a response by integrating a natural language input from the user with specific user data from the linked user database and data from the knowledge database, and updating the linked user database with a natural language input and response thereto, whereby future responses to the identified user may refer to the updated linked user database for the identified user.

Additionally, Noyes, like Thompson, does not disclose a help program that is used in conjunction with a computer software program, but rather is directed solely towards information recognition, storage, and use patterns. More specifically, although the user can interact with the system, it is merely for the purpose of viewing or retrieving information that has been cross-referenced with a myriad of other bits of information. Again, there is no provision in Noyes of interacting with the user to solve a problem, especially based on the user's previous interaction with the computer program. Furthermore, there is no suggestion in Noyes that any response to the user, regardless of its purpose, is in any way uniquely molded to the user based upon specific user data from a linked user database. That is, any response disclosed by Noyes would seem to be based solely on the contents of the information database, and has nothing whatsoever to do with any one specific user, his or her history with the system, or his or her past interactions with the system.

Thus, one of ordinary skill in the art would not look to Thomson and/or Noyes, either alone or in combination therewith, for guidance on a method utilizing a help software program having a plurality of user databases and a knowledge database, the help program working in conjunction with

a computer related application for interacting with a user in a natural language format when the user requires assistance in relation to the computer related application, as presently claimed.

Because claim 1 is allowable over Thomson and/or Noyes, either alone or in combination therewith, for at least the reasons stated above, claims 2-4 and 6-14, which depend from and further define claim 1, are likewise allowable.

Accordingly, the Applicants contend that the 35 U.S.C. 103(a) rejection of claims 1-4 and 6-14 has been overcome.

35 USC §103(a) REJECTION

Claim 15 stands rejected under 35 USC §103(a) as being unpatentable over Thomson (USPN 5,634,051) in view of Noyes (USPN 5,379,366), as applied to claim 1 above, and in further view of Dekelbaum et al. (USPN 5,838,682).

The Applicants respectfully traverse the 35 USC §103(a) rejection of claim 15.

As previously noted, neither Thomson nor Noyes, either alone or in combination therewith, render obvious independent claim 1 for at least the reasons set forth above. The recitation of Dekelbaum et al. does not cure the deficiencies in the teachings of either Thomson and/or Noyes, either alone or in combination therewith.

Specifically, Dekelbaum et al. fails to suggest, among other things, the combination of accessing specific user data from a linked user database that has been generated as a result of at least one previous interaction between the identified user and a help software program and that is specifically related to the identified user, formulating a response by integrating a natural language

input from the user with specific user data from the linked user database and data from the knowledge database, updating the linked user database with a natural language input and response thereto, whereby future responses to the identified user may refer to the updated linked user database for the identified user, the help program working in conjunction with a computer related application for interacting with a user in a natural language format when the user requires assistance in relation to the computer related application, and the formatting the response being further defined as uniquely molding the response to the identified user based upon the specific user data from the linked user database.

Therefore, one of ordinary skill in the art would not look to Thomson, Noyes, and/or Dekelbaum et al., either alone or in combination therewith, for guidance on a method for utilizing a help software program, as presently claimed.

Accordingly, neither Thomson, Noyes, and/or Dekelbaum et al., either alone or in combination therewith, render claim 1 obvious. Additionally, dependent claim 15, which depends from and further limits independent claim 1, is likewise not rendered obvious by Thomson, Noyes, and/or Dekelbaum et al., either alone or in combination therewith.

35 USC §103(a) REJECTION

Claim 16 stands rejected under 35 USC §103(a) as being unpatentable over Thomson (USPN 5,634,051) in view of Noyes (USPN 5,379,366), as applied to claim 1 above, and in further view of Johnson et al. (USPN 5,978,455).

The Applicants respectfully traverse the 35 USC §103(a) rejection of claim 16.

As previously noted, neither Thomson nor Noyes, either alone or in combination therewith, render obvious independent claim 1 for at least the reasons set forth above. The recitation of Johnson et al. does not cure the deficiencies in the teachings of Thomson and/or Noyes, either alone or in combination therewith.

Specifically, Johnson et al. fails to suggest, among other things, the combination of accessing specific user data from a linked user database that has been generated as a result of at least one previous interaction between the identified user and a help software program and that is specifically related to the identified user, formulating a response by integrating a natural language input from the user with specific user data from the linked user database and data from the knowledge database, updating the linked user database with a natural language input and response thereto, whereby future responses to the identified user may refer to the updated linked user database for the identified user, the help program working in conjunction with a computer related application for interacting with a user in a natural language format when the user requires assistance in relation to the computer related application, and formatting the response being further defined as uniquely molding the response to the identified user based upon the specific user data from the linked user database.

Therefore, one of ordinary skill in the art would not look to Thomson, Noyes, and/or Johnson et al., either alone or in combination therewith, for guidance on a method for utilizing a help software program as presently claimed.

Accordingly, neither Thomson, Noyes, and/or Johnson et al., either alone or in combination therewith, render claim 1 obvious. Additionally, dependent claim 16, which depends from and

further limits independent claim 1, is likewise not rendered obvious by Thomson, Noyes, and/or Johnson et al., either alone or in combination therewith.

CONCLUSION

In view of the foregoing, the Applicant respectfully requests reconsideration and reexamination of the Application. The Applicant respectfully submits that each item raised by Examiner in the Advisory Action mailed October 3, 2006 has been successfully traversed, overcome or rendered moot by this response. The Applicant respectfully submits that each of the claims in this Application is in condition for allowance and such allowance is earnestly solicited.

The Examiner is invited to telephone the Applicants' undersigned attorney at (248) 723-0487 if any unresolved matters remain.

Any needed extension of time is hereby requested with the filing of this document.

The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 08-2789.

Respectfully submitted,

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